

EXHIBIT G

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 Norfolk Division
4 CASE NO. 2:18CV530

5 CSX TRANSPORTATION, INC.,
6 INDIVIDUALLY AND ON BEHALF OF NORFOLK
7 & PORTSMOUTH BELT LINE
8 RAILROAD COMPANY,

9 Plaintiffs,

10 -vs-

11 NORFOLK SOUTHERN RAILWAY
12 COMPANY, NORFOLK & PORTSMOUTH
13 BELT LINE RAILROAD COMPANY,
14 JERRY HALL, THOMAS HURLBUT,
15 PHILIP MERILLI, and CANNON MOSS,

16 Defendants.
17 _____/

18 Zoom Remote Proceedings
19 Wednesday, March 17, 2021
20 1:19 p.m. - 6:37 p.m.

21 VIDEOTAPED TELECONFERENCE DEPOSITION OF ROB GIRADOT

22
23 Taken before Robyn Maxwell, RPR, FPR,
24 RSA, and Notary Public in and for the State of Florida at
25 Large, pursuant to Notice of Taking Deposition filed in
the above-mentioned cause.
Job No. CS4501152

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Q. In your declaration -- back to paragraph 3



Did I read that accurately?

A. Yes, you did.

Q. So where did the assumption of 1.67
containers per well come from?

A. That's our general experience of the level
of utilization that we were able to achieve in and out of
ports at the -- at the time of that -- that analysis was
done. That was our benchmark.

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